

RECEIVED

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

JUN 11 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re)
)
CHAMELEON RADIO CORPORATION) MM Docket No. 96-173
)
Order to Show Cause Why the License)
of Station KFCC(AM), Bay City,)
Texas, Should Not Be Revoked)
)
Request for Extension of Special)
Temporary Authority)
)
Request for Extraordinary Relief)

To: The Commission

MOTION FOR EXTENSION OF TIME

1. Chameleon Radio Corporation ("Chameleon") and Bernard Smoots ("Smoots"), through counsel and pursuant to Section 1.46 of the Commission's Rules, hereby submits this Motion for Extension of Time for an additional week to file a Reply to the Mass Media Bureau's ("Bureau") Opposition to Chameleon's and Smoots' Petition for Reconsideration of the Commission's Decision revoking Chameleon's license for radio station KFCC(AM), Bay City, Texas.¹

2. The Bureau filed its Opposition on June 1, 1998, and sent a copy to counsel for Chameleon via first class mail. Accordingly, pursuant to Sections 1.106(h) and 1.4(h) of the

1. The Mass Media Bureau has graciously consented to this request.

Commission's rules, the deadline for filing a Reply to the Opposition is June 11, 1998. However, counsel for Chameleon and Smoots met with the Bureau after receiving the Opposition and are obtaining additional information to respond to the Bureau's concerns pertaining to the Petition.

3. Additionally, counsel for Chameleon and Smoots had to relocate their office during the pleading cycle and, because of that interruption, has been unable to prepare a Reply. Accordingly, Chameleon and Smoots respectfully request additional time, until June 18, 1998, in which to file a Reply.

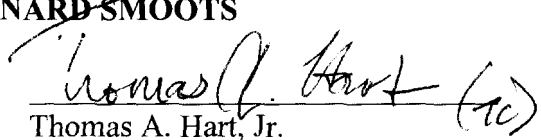
4. Chameleon is facing loss of its license, the most serious sanction the Commission can impose, in this proceeding. Accordingly, Chameleon respectfully requests this one week extension in which to file a Reply so that it can submit the best response possible. Furthermore, no one will be disadvantaged by grant of this Motion for Extension of Time.

5. Accordingly, in light of the foregoing reasons, Chameleon and Smoots respectfully request that the Commission grant this Motion and allow them to file a Reply to the Bureau's Opposition on or before June 18, 1998.

Respectfully submitted,

CHAMELEON RADIO CORP.
BERNARD SMOOTS

By:

 (tc)
Thomas A. Hart, Jr.

Mark N. Lipp

M. Tamber Christian

Their Attorney

SHOOK, HARDY & BACON, LLP

801 Pennsylvania Ave., NW, Suite 600

Washington, DC 20004

(202) 783-8400

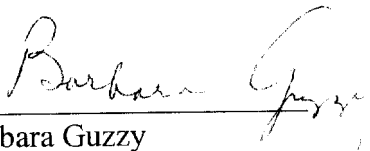
June 11, 1998

CERTIFICATE OF SERVICE

I, Barbara Guzzy, a secretary in the office of Shook, Hardy & Bacon, L.L.P., do hereby certify that a copy of the foregoing Motion for Extension of Time was hand delivered this 11th day of June, 1998, to:

Roy J. Stewart
Renee Licht
Norman Goldstein
Alan E. Aronowitz
Kathryn S. Berthot
Federal Communications Commission
Mass Media Bureau
2025 M Street, NW
Suite 8210
Washington, DC 20554

Charles Kelly
Federal Communications Commission
Mass Media Bureau
2025 M Street, NW
Room 8202
Washington, DC 20554



Barbara Guzzy